# THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	]	
	]	
v.	]	Cr. No. 19-cr-142-01-LM
	]	
	]	

## NATHAN CRAIGUE

#### ASSENTED-TO MOTION TO CONTINUE TRIAL FOR 30 DAYS

The defendant, Nathan Craigue, through his counsel, Dorothy E. Graham, AFPD, files this motion respectfully requesting that the Court continue his trial currently set for October 20, 2020.

Grounds follow.

On July 10, 2019, Craigue was indicted for two counts of False Statement to a Federal Agent in violation of 18 U.S.C. § 1000. It is alleged that Craigue knowingly and willfully made material false statements to an OSHA Compliance Safety & Health Officer by stating that KM was a subcontractor.

Trial was originally scheduled for the October 20<sup>th</sup> jury selection. Per the Court's telephonic conference today, jury selection for October 20<sup>th</sup> was not available, but the October 6<sup>th</sup> jury selection was. Counsel is seeking a continuance of thirty days to allow sufficient time to prepare the case for trial.

The government, through AUSA Anna Dronzek, assents.

#### Certification

I, Dorothy E. Graham, Assistant Federal Defender, certify that (1) I have consulted with the defendant about the requested continuance; (2) I have explained that by

seeking a continuance, he is waiving his constitutional and statutory rights to a speedy trial; and (C) he has personally assented to the continuance and; (D) I will forthwith mail him a copy of the motion to continue.

Wherefore the defendant respectfully moves the Court to grant this motion and to continue the trial for 30 days, and for such other relief as may be deemed just.

Respectfully submitted,

Date: September 14, 2020 /s/ Dorothy E. Graham

Dorothy E. Graham N.H. Bar No. 11292 Assistant Federal Defender 22 Bridge Street, 3<sup>rd</sup> floor Concord, NH 03301 Tel. (603) 226-7360

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### **CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on the following person on September 14, 2020 and in the manner specified herein: electronically served through CM/ECF to AUSA John Davis and AUSA Anna Dronzek.

/s/Dorothy E. Graham
Dorothy E. Graham